

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 18-13947</b>
<b>Stacy A McCauley Cooney</b>	:	<b>Chapter 13</b>
	:	<b>Judge Magdeline D. Coleman</b>
<b>Debtor(s).</b>	:	<b>*****</b>
<b>Stacy A McCauley Cooney, William C. Miller, Esq.</b>	:	
<b>Movant</b>	:	<b>Related to Document No. 94</b>
	:	
<b>v.</b>	:	
	:	
<b>Nationstar Mortgage LLC d/b/a Mr. Cooper</b>	:	
<b>Respondent</b>	:	

**RESPONSE TO MOTION TO REINSTATE (DOCKET # 94)**

Now comes Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Reinstate filed by Stacy A McCauley Cooney ("Debtor") on May 3, 2021 at Docket # 94.

Creditor states that Debtor's account is not post-petition current and to reinstate the stay would be prejudicial to Creditor. Debtor is post-petition due for April 1, 2020 through June 1, 2020 with a monthly payment amount at \$2,652.35 and July 1, 2020 through May 1, 2021 with a monthly payment amount of \$2,655.20. In addition, Creditor has incurred additional fees and costs that remain outstanding and may be recoverable. Creditor does not object to vacating the relief order if Debtor is able to cure the delinquency at or before a hearing on this matter.

WHEREFORE, Creditor respectfully requests that the motion be denied.

Respectfully submitted,

/s/ Sarah E. Barngrover  
Sarah E. Barngrover, Esquire (323972)  
Adam B. Hall (323867)  
Manley Deas Kochalski LLC

P.O. Box 165028  
Columbus, OH 43216-5028  
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Attorneys for Creditor  
The case attorney for this file is Sarah E.  
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**Stacy A McCauley Cooney, William C.** :  
**Miller, Esq.** : **Related to Document No. 94**  
**Movant** :  
**v.** :  
:   
**Nationstar Mortgage LLC d/b/a Mr.** :  
**Cooper** :  
**Respondent** :

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Response to Motion to Reinstate was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105,  
ecfemails@ph13trustee.com

Brad J. Sadek, Attorney for Stacy A McCauley Cooney, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 14, 2021:

Stacy A McCauley Cooney, 313 BeechTree Drive, Broomall, PA 19008

Stacy A McCauley Cooney, 313 Beechtree Dr, Broomall, PA 19008

Asset Acceptance, LLC, P.O. Box 1630, Warren, MI 48090

Pennsylvania Department of Revenue, 110 N 8th St Ste 204b, Philadelphia, PA 19107

PNC Bank, 300 Fifth Avenue, Pittsburgh, PA 15222

/s/ Sarah E. Barngrover

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Adam B. Hall (323867)  
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